

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI

JOHN N. CASTELLANO, III)	
)	
Plaintiff,)	
)	
v.)	Cause No. 1722-CC11086
)	
VERNON BETTS, et al.)	Division No. 19
)	
Defendants.)	

**DEFENDANTS' SUPPLEMENTAL ANSWERS TO
PLAINTIFF'S FIRST INTERROGATORIES**

COME NOW, Defendants, and for their Supplemental Answers to Plaintiff's First Interrogatories, state:

1. Please state:
 - a. The name and address of the person or persons answering these interrogatories;
 - b. His/her relationship to defendant; and
 - c. His/her position of employment

ANSWER: Vernon Betts, defendant, Sheriff of the City of St. Louis

2. Please state your employer's name for the last five years and the position, title and job duties at each place of employment.

ANSWER:

Sheriff, City of St. Louis – provide security for the people who use the 22nd Judicial Circuit Courts. January 1, 2017 to present.

Scottrade Security Officer (2012-January, 2017) – provide security for events at Scottrade

3. State whether or not a statement, interview, or report, or a stenographic, mechanical, electrical, audio, video, motion picture, photograph, or other recording, or transcription of Plaintiff, relating to any claims made in the Petition, or if a statement made by Plaintiff and contemporaneously recorded, has been secured and, if so, state the following:

14. State and describe all reasons Antoine Cannon was promoted to the rank of sergeant on or about April 19, 2017 instead of Plaintiff.

ANSWER: Objection. This is a contention interrogatory and Defendant should not be required to answer until discovery is complete.

FIRST SUPPLEMENTAL ANSWER: Antoine Cannon was promoted for all the reasons stated in First Supplemental Answer to Interrogatory # 13. Cannon was not promoted “instead of” Plaintiff because Plaintiff was not considered for this position for the reasons expressed in First Supplemental Answer to Interrogatory # 10.

15. State and describe the process Vernon Betts used to promote Antoine Cannon to the rank of sergeant.

ANSWER: The process employed by Sheriff Betts in promoting employees is to promote employees on a merit basis, based on his personal knowledge.

16. State and describe the process Vernon Betts was supposed to use relating to Plaintiff's September/October 2016 application for promotion which ultimately resulted in Antoine Cannon being promoted on or about April 19, 2017 (“Cannon Promotion”)

ANSWER: Objection. This is a contention interrogatory and Defendant should not be required to answer until discovery is complete. Moreover, this interrogatory assumes facts not in evidence and is argumentative and improper.

17. State and describe all reasons Danny McGinnis was promoted to the rank of sergeant on or about April 19, 2017.

ANSWER: Objection. This is a contention interrogatory and Defendant should not be required to answer until discovery is complete.

FIRST SUPPLEMENTAL ANSWER: Danny McGinnist was promoted to Sergeant (in August 2017, not April) of the Security Unit because of his level of experience with the Courts, his attitude and leadership skills, and for being a good communicator with a reputation for relating well with his colleagues.

18. State and describe all reasons Danny McGinnis was promoted to the rank of sergeant on or about August 7, 2017 instead of Plaintiff.

ANSWER: Objection. This is a contention interrogatory and Defendant should not be required to answer until discovery is complete.

FIRST SUPPLEMENTAL ANSWER: Danny McGinnist was promoted for all the reasons stated in First Supplemental Answer to Interrogatory # 17. McGinnist was not promoted “instead of” Plaintiff because Plaintiff was not considered for this position for the reasons expressed in First Supplemental Answer to Interrogatory # 10.

19. State and describe the process Vernon Betts used to promote Danny McGinnis to the rank of sergeant.

ANSWER: The process employed by Sheriff Betts in promoting employees is to promote employees on a merit basis, based on his personal knowledge.

20. State and describe the process Vernon Betts was supposed to use relating to Plaintiff's September/October 2016 application for promotion which ultimately resulted Danny McGinnis being promoted on or about August 7, 2017 (“McGinnis Promotion”)

ANSWER: Objection. This is a contention interrogatory and Defendant should not be required to answer until discovery is complete. Moreover, this interrogatory assumes facts not in evidence and is argumentative and improper.

21. State the name, address and race relating to the individual that was promoted to the rank of sergeant by Defendant Betts in or about July of 2017 (“July 2017 Promotion”)

ANSWER: None.

22. State and describe all reasons the individual promoted in the July 2017 Promotion was promoted to the rank of sergeant.

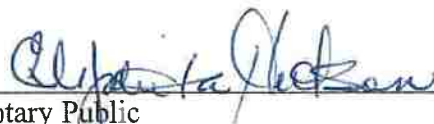
ANSWER: Not applicable.

STATE OF MISSOURI)
) SS
CITY OF ST. LOUIS)

Vernon Betts, being duly sworn upon his oath, states that the foregoing Defendants' Supplemental Answers to Plaintiff's First and Second Sets of Interrogatories to Defendants are true according to his best knowledge, information and belief.


Vernon Betts

Subscribed and sworn to before me this 6th day of September, 2019.


Notary Public

